

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

Caption in Compliance with D.N.J. LBR 9004-1(B)

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Future Talc Claimants*

In re:
LTL MANAGEMENT LLC,
Debtor.

Case No.: 21-30589

Judge: Michael B. Kaplan

Chapter: 11

**STATEMENT OF RANDI S. ELLIS
LEGAL REPRESENTATIVE FOR FUTURE TALC CLAIMANTS REGARDING
THE OFFICIAL COMMITTEE OF TALC CLAIMANTS' MOTION TO COMPEL**

Randi S. Ellis, Legal Representative for Future Talc Claimants (the "Future Claimants' Representative" or "FCR"), by and through her counsel, Walsh Pizzi O'Reilly Falanga LLP, hereby submits this statement with respect to the pending Motion to Compel filed by the Official Committee of Talc Claimants ("TCC") (ECF No. 3336), scheduled to be heard by the Court on December 20, 2022, at 10:00 am EST (docket entry after ECF No. 3342).

The FCR confirms her position as stated to the Court during the hearing held on November 30, 2022 (in connection with Adversary Proceeding No. 22-1231) that in furtherance of the ongoing estimation process including communications with the Court-Appointed Expert, it is important that the parties have access to and are able to utilize the same data of relevant

information, including information on known populations of ovarian cancer and mesothelioma claimants, and any verdicts and settlements with respect to such claims. The FCR recognizes the issues presented to the parties as a result of the Third Circuit appeal and the uncertainty relating to whether the Debtor will remain in bankruptcy. While the pendency of the appeal may warrant a more informal process pending its outcome, the FCR nonetheless shares the Court's view that it would be preferable to avoid having issues during the estimation process due to relevant information not being disclosed or available to all parties and in this respect joins in the TCC's Motion to the extent it seeks to access information the Debtor has shared with other parties in this case.

Dated: December 16, 2022

Respectfully submitted,

s/Mark Falk

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